

Bernard-Drakey, Jamie

From: Wilder, Valerie <valerie.wilder@dnr.mo.gov>
Sent: Monday, April 28, 2014 2:43 PM
To: Bernard-Drakey, Jamie
Cc: hillary.wakefield@dnr.mo.gov; dennis.stinson@dnr.mo.gov
Subject: FW: Laclede Coal Gas- Request for Federal Action
Attachments: form Section 128 Request DStinson signature.pdf

Jamie, attached is the referral form for Laclede Coal Gas. Note on the form that the current address listed in CERCLIS for the site is incorrect – maybe when you dearchive it, if you haven't already, you could change the address. Let us know if there is anything else you need before Hillary wraps up the Site Reassessment report. Thanks,

Valerie Wilder

Chief, Site Assessment Unit, Superfund Section
Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176 Jefferson City, MO 65102-0176
Phone 573 751-7880/Fax 573 751-7869

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From: Wakefield, Hillary
Sent: Monday, April 28, 2014 9:00 AM
To: Wilder, Valerie
Cc: Wakefield, Hillary
Subject: RE: Laclede Coal Gas- Request for Federal Action

Val, Dennis thought everything sounded good and signed off on the form (attached). My summary I sent him is in the email below if you would like to forward that on too.

Hillary L. Wakefield

Environmental Project Manager
Missouri Department of Natural Resources
Hazardous Waste Program
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From: Wakefield, Hillary
Sent: Thursday, April 24, 2014 2:16 PM
To: Stinson, Dennis

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Superfund

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Cc: Wilder, Valerie; Wakefield, Hillary

Subject: Laclede Coal Gas- Request for Federal Action

Importance: High

Dennis,

Valerie has talked with Jamie regarding the Laclede Coal Gas site (EPA ID #MOD981715980). MDNR would like to recommend referring the site back to EPA for further assessment, including removal assessment and/or removal action. A Request for Federal Action Form has been filled out and attached for your review, along with a summary and some reasons (below) why we are suggesting further assessment of this site. This is rather lengthy summary, but I included it for you in case you had questions. Could you please look over and let Val or I know if it sounds good so we can send it on to Jamie. Thanks!

The Laclede Coal Gas site is an FMGP and is located approximately 300 west of the Mississippi River and has included the Mound Street PCB's site (EPA ID# MO0000093682), a former electrical power plant. Starting in 1976, investigations regarding several oil slicks on the Mississippi River suspected to originate from the former electric power plant began to occur. In the earlier 1980s, numerous oil spills possibly leading to flooding in the electric plant facility's basement prompted EPA investigations which comprised of the FMGP location and an underground storage tank (UST) located just north of Mound Street on another property. Polychlorinated biphenyls (PCBs) were the main contaminant of concern. Because of the various contaminant concerns addressed (FMGP, oil leaks, UST), it lead to a confusing history with many aliases for what would become of the two EPA CERCLA sites, Mound Street PCB's and Laclede Coal Gas. A Preliminary Assessment (PA) and a Screening Site Inspection (SSI) have been done for both the Mound Street PCB's site and the Laclede Coal Gas site.

In review of the Laclede Coal Gas and Mound Street PCB's sites for the Site Reassessment (SR) report, plenty of evidence has be found indicating that Laclede Coal Gas needs a comprehensive assessment completed with a possible removal assessment and/or removal action completed. Several points are highlighted in the bullets below:

- Eight investigations were located during the research of the SR. These investigations were conducted either on the Laclede Coal Gas location or on sites located nearby. The 2 PAs and 2 SSIs are listed below. Several smaller investigations by the US Coast Guard, St. Louis Metropolitan Sewer District, Terminal Railroad Association, etc. were also listed in the report, but were not as thorough and complete with sampling and conclusions as the CERCLA reports.
 - **1988 PA by E&E (tasked by EPA) for Mound Street Power Plant (listed under the EPA ID #MOD981715980, which is the current EPA ID# for Laclede Coal Gas, even though its main focus was the power plant).**
 - Based on the St. Louis Division of Health and the E&E/FIT sampling there was no PCB contamination in the oils present in the basement of the former electric power plant, (Mound Street Power Plant). This statement is qualified in that the PCB detection limits were 1 ppm for the E&E data and unknown for the St. Louis Division of Health data. No evidence was uncovered suggesting that the oil in the basement should contain PCBs. Initial concerns were raised based on the existence of large electric transformers located on site. The evidence suggests that the oil in these transformers was moved off site. The most likely point of origin of the oil is the Apex Oil PFT located several yards uphill from the former electric power plant, where the material was contained in a concrete basement.
 - There was no recommendations attached or found for this report, but in the Potential -Hazardous Waste Site worksheet, in section 4 under comments, it says: "Currently the site is considered to

involve only the oil in the former power plant. The former coal gas site should be included in consideration of this site". "The facility may constitute the largest coal gas facility in Region VII" was also quoted in the conclusion.

- **1991 SSI by E&E (tasked by EPA) for Laclede Coal Gas (listed with EPA ID #MOD981715980).**

- The purpose of the investigation was to evaluate the potential threat the site poses to the ground water, surface water, air and on site pathways. The PA focused on potential chemical hazards associated with the current facility (Apex Oil Petroleum & Fuel Terminal) and past operations (FMGP) on-site.

- Because of the abundance of potable surface water within the area of the site, groundwater is not utilized as a source of drinking water. The city of St. Louis and surrounding communities water intake is approximately 9 miles upstream from the site. A municipal intake for the Illinois Metro East community is located almost directly across the Mississippi River and approximately 300,000 residents are served by this water supply. It was determined, not likely that any sensitive environment or critical habitats occur within 15 miles downstream of the site.

- During the site recon, seepage was leaching through a concrete wall of an abandoned pump house directly into the Mississippi River. No samples of the seepage were collected.

- Some of the sampling data was unclear regarding where samples were collected.

- The sampling data identified cyanides, BTEX compounds, and PAHs as the major on site contaminants. Cyanide and PAHs were detected above the background detection limits in surface soils samples that were submitted for CLP analysis. None of the samples collected during the Laclede Coal Gas SSI were analyzed for PCBs. In the E&E/FIT SSI report, it is stated that a mixed source is present since BTEX compounds "are not considered abundant in coal tar." The PAHs and cyanide were attributed to the former coal gas operations. It was also stated that some PAH contamination may be attributed to the adjacent Apex Oil PFT, which stores oil and asphalt. Several of the soil and subsurface soils samples collected exceeded the lowest SCDM and EPA SL for Industrial Use as well as were significantly above background concentrations.

- No recommendations were found in this report.

- **1994 PA by MDNR for Mound Street PCB's (EPA ID# MO0000093682).**

- Mostly addressed the Mound Street PCB's site but does mention the Laclede Coal Gas site.

- Soil exposure and air pathways were determined as a low possibility for potential exposure to occur. Gravel covers the site and soil exposure would only occur if the soil at the site were to be disturbed.

- Analytical results confirm contamination of the shallow groundwater in the area by cyanide and PAH compounds from the FMGP. In addition, there is a strong possibility that PCBs mixed with petroleum have also infiltrated the shallow aquifer, but this aquifer is not used for drinking.

- There was a Summary and Conclusions section at the end of MDNR's PA report but no recommendations were included.

- **1996 SSI by Sverdrup (tasked by EPA) for Mound Street PCB (EPA ID# MO0000093682).**

- The SSI report acknowledges that the Mound Street PCB's site is a subsite of the Laclede Coal Gas site.

- Sampling included collecting groundwater samples from two existing monitoring wells, and collection of subsurface soil samples. Sample analysis showed levels of volatiles, semi-volatiles and PCBs below the detection limits for the other sample location and less than the background levels

identified during the 1991 SSI of the Laclede Coal Gas site because no background samples were collected during this sampling trip.

-No conclusions or recommendations were made.

- Much of the sampling effort of the investigations involved PCBs and did not focus much on the contamination of the FMGP, although coal gas wastes were discussed in several of the reports.
- E&E's 1988 PA also found historical documents providing identification that Laclede Coal Gas may constitute as one of the largest coal gas facilities in EPA Region 7 and that coal gas should be a consideration of this site. This report also estimated that approximately 930 million gallon of coal tar waste was produced at this facility, with 76% being sold and 24% being buried on site in unlined pits.
- A release to the surface water seems likely considering several documented oil and seepage instances directly to the Mississippi River.
- E&E's 1988 PA mentioned possibility that contaminants are potentially being released into the groundwater and being discharged into the Mississippi River. The documented oil releases to the surface water would put surface water targets at risk.
- After reviewing all four CERCLA reports, no recommendations of any kind were found in or after the conclusion of these reports. To date, nothing has been done. EPA did send a letter in 1996 to the St. Louis Metropolitan Sewer District saying the following:

"The levels of contamination found, the setting of the site, and the potential for human exposures were such that the EPA Superfund program does not intend to undertake additional actions at this time on this site. We would reassess this decision should we receive additional information relevant to this determination.

Nonetheless, there remains the potential that digging into the subsurface of portions of the site that EPA could not sample might encounter potentially significant levels of contamination. Therefore, we would recommend that your department consider the need for additional testing should you need to dig into the subsurface at this site in areas of potential contamination."

Hillary L. Wakefield

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REQUEST FOR FEDERAL ACTION

The Missouri Department of Natural Resources (Requesting Agency) requests, pursuant to Section 128(b)(1)(B)(i) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9608(b)(1)(B)(i), the assistance of the United States Environmental Protection Agency, Region 7 (EPA) in the evaluation of site conditions and/or the performance of a response action, for the following site:

Laclede Coal Gas (EPA ID#: MOD981715980)

Mullanphy & N. 1st Streets (In CERCLIS, the street
address for Laclede Coal Gas is "Mound St & Broadway"
which is incorrect (see attached map) and needs to be
changed. The CERCLIS address is located 1 block
northwest of the actual site.

Street Address

Apex Oil Petroleum Fuel and Terminal is currently
operating and located at this site location

Property Description

St. Louis

City

City of St. Louis

County

Missouri

State

By making this request, the Requesting Agency recognizes that the EPA, or any other entity acting on behalf of the EPA, may use its authorities under CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300, or any other federal statute, regulation or response program, to respond to and recover costs incurred in response to releases or threats of releases of hazardous substances, pollutants and/or contaminants at or from the site. By making this request, the Requesting Agency waives notice as otherwise required by Section 128(b)(1)(D) of CERCLA, 42 U.S.C. § 9628(b)(1)(D). The signatory of this request is authorized to make this request on behalf of the Requesting Agency.

Date April 24, 2014



Name

Superfund Section Chief

Title

Missouri Department of Natural Resources

Requesting Agency